

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC,

Plaintiff,

v.

CELLCO PARTNERSHIP, D/B/A
VERIZON WIRELESS, AND VERIZON
CORPORATE SERVICES GROUP INC.,

Defendants.

Case No. 2:24-cv-00007-JRG-RSP

JURY DEMANDED

PLAINTIFF’S UNOPPOSED MOTION TO EXTEND CONTENTIONS DEADLINES

Plaintiff Headwater Research, LLC (“Headwater”) respectfully files this Unopposed Motion to Extend Deadline for Initial Disclosures and would show the Court as follows:

The current deadline for Headwater to serve infringement contentions in compliance with P.R. 3-1 and PR 3-2 is March 11, 2024. The current deadline for Defendants Cellco Partnership, d/b/a Verizon Wireless, and Verizon Corporate Services Group Inc. (collectively, “Defendants” or “Verizon”) to serve invalidity contentions in compliance with P.R. 3-3 and P.R. 3-4, and to serve subject-matter eligibility contentions, is May 6, 2024. The parties agree to a brief mutual extension of these deadlines, which will allow additional time for the parties to prepare their contentions disclosures. No other deadlines will be affected by these amendments.

Headwater represents that this Motion is not filed for the purposes of delay but rather so that justice may be served. The parties have met and conferred, and Defendants do not oppose this Motion.

Accordingly, Headwater respectfully requests that the Court enter an Order modifying the above deadlines as follows:

Original Date	Amended Date	Event
March 11, 2024	March 18, 2024	Comply with P.R. 3-1 & 3-2 (Infringement Contentions)
May 6, 2024	May 20, 2024	Comply with P.R. 3-1 & 3-2 (Infringement Contentions)
May 6, 2024	May 20, 2024	Comply with Standing Order Regarding Subject-Matter Eligibility Contentions

Dated: March 13, 2024

Respectfully submitted,

/s/ Marc Fenster

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**ATTORNEYS FOR PLAINTIFF,
Headwater Research LLC**

CERTIFICATE OF SERVICE

I hereby certify that all counsel of record who are deemed to have consented to electronic service are being served this 13th day of March 2024, with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Marc Fenster

Marc Fenster

CERTIFICATE OF CONFERENCE

The undersigned certifies that counsel complied with the requirements of Eastern District of Texas Local Rule CV-7(h). Defendants do not oppose this motion.

/s/ Marc Fenster
Marc Fenster